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Attorney for Defendant SUNBELT
RENTALS, INC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

JOHNNY CAMPAGNE, as an individual,
Plaintiff,
v.
SUNBELT RENTALS, INC. a California
Corporation; SHAWN HORAN, an individual,
and Does 1 through 50, inclusive
Defendants.

Case No.: 2:21-cv-01930-JAM-CKD

**STIPULATION AND ORDER FOR FILING
AMENDED COMPLAINT**

Plaintiff JOHNNY CAMPAGNE, and defendants SUNBELT RENTALS, INC. and SHAWN
HORAN, acting by and through their counsel of record, stipulate and agree as follows:

STIPULATION

1. Counsel have met and conferred regarding the current complaint. So as to avoid the need
for motion practice, counsel have agreed – subject to the Court’s approval – plaintiff will file and amended
complaint as follows:

a. Defendant Shawn Horan will be dismissed as to the eighth, ninth and eleventh causes of
action.

b. References to the Family Medical Leave Act will be eliminated from the tenth cause of
action.

c. Plaintiff will amend the allegations contained in the thirteenth cause of action.

2. Counsel for plaintiff will file an amended complaint by October 26, 2021. Defendants’
response to that amended complaint will be due not later than 20 days after the amended complaint is
served.

STIPULATION AND ORDER FOR FILING AMENDED COMPLAINT

3. Pursuant to Local Rule 131(e), the undersigned counsel for Sunbelt Rentals represents that on October 22, 2021, he was authorized to sign this stipulation electronically on behalf of counsel for plaintiff, Johnny Campagne.

DATED: October 22, 2021

SMITH, GAMBRELL & RUSSELL, LLP

By: /s/ Patrick J. Cain
Patrick J. Cain
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ATTORNEY FOR DEFENDANTS
SUNBELT RENTALS, INC. AND
SHAWN HORAN

DATED: October 22, 2021

J. WRIGHT LAW GROUP, P.C.

By: /s/ Jamie E. Wright (as authorized 10/22/2021)
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ATTORNEY FOR PLAINTIFF
JOHNNY CAMPAGNE

STIPULATION AND ORDER FOR FILING AMENDED COMPLAINT

ORDER

Based on the foregoing stipulation, and good cause appearing therefor, the Court ORDERS, as follows:

1. Plaintiff shall have up to and including October 29, 2021 in which to file an amended complaint.

2. Defendants shall have up to and including November 18, 2021 in which to respond to the amended complaint.

At Sacramento, California, this 27th day of October, 2021.

DATED: October 27, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE

STIPULATION AND ORDER FOR FILING AMENDED COMPLAINT